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TESLA, INC. dba TESLA MOTORS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PARTIES' PROPOSED JURY
QUESTIONNAIRE**

Pretrial Conference Date: May 11, 2020
Time: 10:00 a.m.

Trial Date: June 8, 2020
Complaint filed: October 16, 2017

JURY QUESTIONNAIRE
UNITED STATES DISTRICT COURT

Juror Name: _____ Age _____

Gender : ☐ Male ☐ Female City of Residence _____

1. What is your current (or most recent) occupation? _____

2. What company or employer do you work for? _____

3. Please describe your job duties and responsibilities in your current or last position:

4. Please list any other jobs or careers you've had in the past: _____

5. Are you married or living with or involved with a significant other? ☐

YES ☐ NO

If yes, what does he/she/they do for a living? _____

6. Do you have any children? ☐ YES ☐ NO

If yes, how many? _____ What are their ages? _____

If they're now adults, what do they do for a living? _____

7. Have you ever had any of the following work experiences?

- ☐ A job where you made important financial or personnel decisions for a company
- ☐ A job where you managed or supervised employees
- ☐ A job where you had to deal with employee complaints of mistreatment in the workplace
- ☐ Seen an employee who was a headache to manage because they didn't get along with others
- ☐ Owned, operated, or worked for a company that was harmed by lawsuits
- ☐ Seen or worked for a company that was unfairly sued by an ex-employee for wrongful termination
- ☐ Handled internal employment related investigations

If YES, please explain: _____

8. Have you ever seen any of the following situations in a workplace?

- ☐ Been a temp or staffer doing work for one company while being hired/paid by another company
- ☐ Hired, managed or supervised workers who weren't considered employees of your company
- ☐ Worked for a company that outsourced work or staffing to another company's workers or temps

If YES, please explain: _____

9. Have you (or someone close to you) ever felt mistreated at work by an employer?

☐ YES ☐ NO If YES, please explain: _____

10. Have you, or someone close to you, or someone you worked with or know ever been the victim of racism or discrimination at work?

☐ YES ☐ NO If YES, please explain: _____

11. Have you ever seen any of the following situations in a workplace?

- ☐ Seen someone make a false accusation of racism, harassment, or discrimination in the workplace
- ☐ Seen someone overreact or get offended by a harmless comment or joke in the workplace
- ☐ Seen or heard about someone playing the 'race card' to get special treatment
- ☐ Seen someone get falsely or unfairly accused of racism or racial discrimination
- ☐ Worked with a co-worker who was oversensitive, easily offended, or misinterpreted harmless things
- ☐ Seen a workplace where co-workers often made racial jokes or 'trash talk' without being offended
- ☐ Worked for a company that had workplace conduct rules that were too strict or too politically correct

If YES, please explain: _____

12. Have you (or someone close to you) ever filed a lawsuit or been sued by someone else?

☐ YES ☐ NO If YES, please explain: _____

13. Do you feel like the laws in California are too employee-friendly or unfair toward companies?

☐ YES ☐ NO Explain: _____

14. Do you feel like the laws in California are too employer-friendly or unfair toward employees?

☐ YES ☐ NO Explain: _____

15. Do you have feelings of respect or admiration or feelings of disrespect or no admiration for Elon Musk, his inventions, or his companies

(for example, Tesla or SpaceX)?

☐ YES ☐ NO

Explain: _____

16. Have you or anyone close to you ever worked for Tesla, as an employee or contractor?

☐ YES ☐ NO

If YES, please explain: _____

17. What are your feelings about a person seeking seek money compensation

in a lawsuit for non-financial harms like mental/emotional suffering? ☐ YES ☐ NO

Explain: _____

18. Do you have any other opinions, feelings, concerns, experiences, personal or religious beliefs, or possible biases that you think might make it difficult for you to be neutral as a juror in a lawsuit seeking money damages against an employer?

☐ YES ☐ NO If YES, please explain: _____

I DECLARE UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE
FOREGOING STATEMENTS ARE TRUE AND CORRECT:

Juror Signature

CALIFORNIA CIVIL RIGHTS LAW GROUP
ALEXANDER KRAKOW + GLICK LLP

DATED: April 27, 2020

By: /s/
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SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

DATED: April 27, 2020

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